

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**Deel, *et al.***

**Defendants.**

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**Case No. 4:22-cr-612**

**The Honorable Andrew S. Hanen**

**United States' Response in Opposition to Defendant Deel's Motion to Remove GPS  
Monitoring**

The United States, by and through undersigned counsel, opposes Defendant Deel's request to remove his GPS monitoring device so that he may vacation and take personal engagement photographs unencumbered. The United States does not object to the travel. But Defendant Deel makes no relevant argument as to why a change in GPS monitoring is warranted.

Indeed, the relevant Section 3142(g) factors counsel for the opposite conclusion, as the Court recently ruled for Defendant Rybarczyk. (*See* ECF No. 341.) Most critically, the strength of the case against Defendant Deel only grows along with his risk of flight. Relative to several of his co-Defendants, Defendant Deel's activity in this litigation has, thus far, been minimal. Defendant Deel seeks to remove his GPS device only now—after the United States produced trial exhibits that include dozens of conversations from Defendant Deel's personal cell phone highlighting the depth of Defendant's involvement in the alleged scheme.

The United States understands that travel and photography sessions with the GPS device may be less than ideal for wedding planning. Such minor inconveniences, however, do not trump the United States' significant interest in securing the appearance of Defendant Deel—who is alleged to have personally profited millions of dollars in the alleged scheme—at trial in two short months.

Dated: August 23, 2023

Respectfully submitted,

GLENN S. LEON  
Chief, Fraud Section  
Criminal Division, Department of Justice

By: /s/ John J. Liolos  
Scott Armstrong, Assistant Chief  
John J. Liolos, Trial Attorney  
Fraud Section, Criminal Division  
United States Department of Justice  
1400 New York Ave. NW  
Washington, DC 20005  
Tel.: (202) 768-2246

ALAMDAR S. HAMDANI  
United States Attorney  
Southern District of Texas

By: /s/ Thomas H. Carter  
Thomas H. Carter  
Assistant United States Attorney  
State Bar No.: TX24048387  
1000 Louisiana Street, 25<sup>th</sup> Floor  
Houston, Texas 77002  
Tel.: (713) 567-9470

**CERTIFICATE OF SERVICE**

I hereby certify that on August 23, 2023, I will cause the foregoing brief to be electronically filed with the Clerk of the Court using the CM/ECF system, which will provide copies to counsel for all parties.

/s/ John J. Liolos

John J. Liolos, Trial Attorney

U.S. Department of Justice

Criminal Division, Fraud Section